

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
WESTERN DIVISION

MAURA O'NEILL, AS ADMINISTRATOR OF
THE ESTATE OF MADELYN E. LINSSENMEIR,
PLAINTIFF

V.

CITY OF SPRINGFIELD, MOISES
ZANAZANIAN, REMINGTON MCNABB,
SHEILA RODRIGUEZ, HAMPDEN COUNTY
SHERIFF'S DEPARTMENT EILEEN BARRETT,
AND MAUREEN COUTURE,
DEFENDANTS

CIVIL ACTION No. 3:20-CV-30036

ORAL ARGUMENT REQUESTED

**MOTION FOR SUMMARY JUDGMENT OF THE DEFENDANTS, HAMPDEN COUNTY
SHERIFF'S DEPARTMENT, EILEEN BARRETT, AND MAUREEN COUTURE**

INTRODUCTION

Pursuant to Fed. R. Civ. P. 56 and Local Rules 56.1 and 7.1, Defendants Hampden County Sheriff's Department (the "HCSD"), Eileen Barrett, and Maureen Couture (the "HCSD Defendants") submit their Motion for Summary Judgment (the "Motion"). As grounds therefore, the HCSD Defendants state that there are no material facts in dispute and the HCSD Defendants are entitled to judgment as a matter of law. The grounds for this Motion are set forth in greater detail in HCSD Defendants' Memorandum of Law (the "Memorandum of Law") filed herewith.

WHEREFORE, the HCSD Defendants respectfully request that this Court enter summary judgment in their favor on all of the counts brought against them, namely Counts II, III, and IV of the plaintiff's First Amended Complaint, and grant

the HCSD Defendants any other relief that the Court deems just and proper.

REQUEST FOR ORAL ARGUMENT

Pursuant to Local Rule 7.1(d), the HCSD Defendants respectfully request oral argument on this Motion.

Respectfully submitted,

HAMPDEN COUNTY SHERIFF'S
DEPARTMENT, EILEEN BARRETT, AND
MAUREEN COUTURE

By their attorney,
ANDREA CAMPBELL
ATTORNEY GENERAL

By: /s/ Thomas E. Day
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CERTIFICATE PURSUANT TO LOCAL RULE 7.1

I certify that on January 5, 2024, prior to filing this motion, I conferred with counsel for the plaintiff in a good faith effort to resolve or narrow the issues raised herein without success.

/s/ Thomas E. Day
Thomas E. Day

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies of this document will be mailed, first-class mail, postage prepaid, to any unregistered participants on January 5, 2024.

/s/ Thomas E. Day
Thomas E. Day